

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TECSPEC LLC, RICHARD ROSE, ROBERT SENIA,  
and RALPH SCHLENKER,

Plaintiffs,

- against -

MICHAEL DONNOLO, JOSHUA DONNOLO,  
JOHN MICHAEL LONG, BRAYA CONCEPTS  
LLC, BRAYA MACHINE COMPANY LLC,  
BRAYA SYSTEMS LLC, BRAYA VENTURES  
LLC, ABC CORPORATIONS 1-10,

Defendants.

Case No. 1:24-cv-08077-JHR

**DECLARATION OF JOHN  
MICHAEL LONG**

**John Michael Long**, states the following as true and accurate, under penalty of perjury:

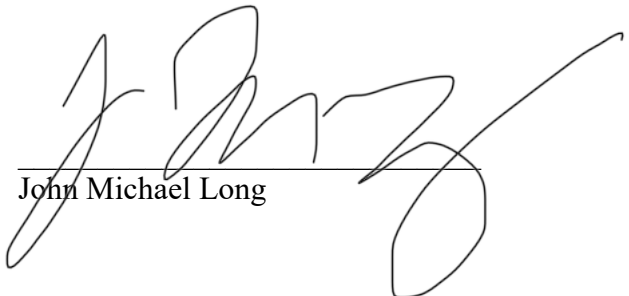
1. I am a Defendant in the above-captioned action and, as such, submit the following which I know to be true on my own personal knowledge.
2. I submit the following in opposition to Plaintiffs' motion seeking a temporary restraining order and preliminary injunction ("Plaintiffs' Motion").
3. Having reviewed the papers filed by Plaintiffs' in the Action, I affirm that many of the factual allegations made against me are patently false, including but not limited to Plaintiffs' Memorandum of Law, ECF No. 11, p. 5, where Plaintiffs allege "Plaintiffs are aware that Mr. Long has machined over 9,000 units for Tecspec's confidential nozzle component for the Braya Entities benefit."
4. The foregoing is patently false on multiple grounds. First, I did not machine over 9,000 nozzle components for Braya Entities or anyone other than Tecspec, nor any nozzle components; I do not have any such components in my possession beyond those few samples that we have traditionally handed out to customers as exemplars of the nozzle for the Tecspec unit.

5. Even worse, the technology used by the Braya Entities does not employ the use of such nozzle components -- it is literally irrelevant to Braya Entities' unit design and, thus, would serve no purpose to retain possession of any such units.

6. The foregoing renders Plaintiffs' allegations nonsensical in that there can be no basis for my possession, or use of such nozzels.

**DECLARATION**

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28, 2024.



John Michael Long